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December 6, 2019

**VIA ELECTRONIC FILING**

Honorable Tonianne J. Bongiovanni, U.S.M.J.  
United States District Court  
District of New Jersey  
402 East State Street  
Trenton, New Jersey 08608

**Re: Todd Stathum v. Barry Nadrowski, et al.**  
**Case No. 3:15-cv-05502-MAS-TJB**

Dear Judge Bongiovanni:

As Your Honor is aware, the Court appointed this office as pro bono counsel for plaintiff Todd Stathum on October 28, 2019. With the consent of opposing counsel, we write to respectfully request an additional forty-five (45) days, given the holidays, to meet and confer and submit a joint proposed scheduling order. We have already conferred with defendant's counsel who will be providing us with copies of discovery exchanged to date and are working with the facility where Mr. Stathum is located to speak with him.

Thank you for your attention to this matter and courtesy.

Respectfully submitted,

**GENOVA BURNS LLC**

/s/ Rajiv D. Parikh  
**RAJIV D. PARIKH**

CZ/RDP:jjr

c: Christopher Zamlout, Esq. (via electronic mail)  
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